

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL,
APRIL MUNIZ, HANNAH PEARCE,
MARCUS MARTIN, NATALIE ROMERO,
CHELSEA ALVARADO, JOHN DOE, and
THOMAS BAKER,

Plaintiffs,

Civil Action No. 3:17-cv-00072-NKM

v.

JASON KESSLER, et al.,

Defendants.

DECLARATION OF JESSICA E. PHILLIPS

I, Jessica E. Phillips, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a Partner at the law firm Boies Schiller Flexner LLP, one of the law firms representing Plaintiffs in this action.

2. I submit this Declaration in support of Plaintiffs' Motion to Compel Discovery from Defendant National Socialist Movement.

3. On October 25, 2019, Defendant Jeff Schoep produced 100 documents to Plaintiffs.

4. Of the 100 documents that Schoep produced, 43 were unreadable gibberish files with no substance with file extensions including ".bin," ".pak," and ".log."

5. Of the remaining 57 readable files, 27 are Google alert notifications.

6. The remaining 30 files are primarily case filings and case-related correspondence, including Plaintiffs' motion for sanctions against Schoep and the 12 exhibits Plaintiffs attached to that motion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 11, 2020
Washington, D.C.

/s/ Jessica E. Phillips
Jessica E. Phillips